



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE

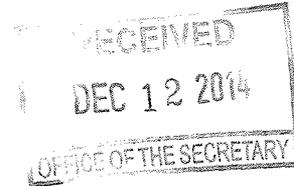
BROOKFIELD PLACE
200 VESEY STREET, ROOM 400
NEW YORK, NY 10281-1022

Alexander Janghorbani
WRITER'S DIRECT DIAL
TELEPHONE: (212) 336-0177
JanghorbaniA@sec.gov

December 11, 2014

By UPS and Email

The Honorable Jason S. Patil
Administrative Law Judge
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-2557



Re: In the Matter of Edgar R. Page, et al., Admin. Proc. File No. 3-16037

Dear Judge Patil:

I represent the Division of Enforcement in this matter and write, pursuant to Rule 232(a), to request the issuance of trial subpoenas ad testificandum in the form attached hereto for the following witnesses.

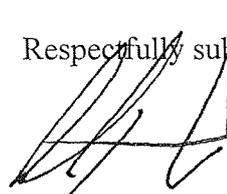
1. Arena, Joseph
2. Burke, Sean
3. Cook, Jeremy
4. Jackson, Robert
5. Madigan, Heather
6. Milkiewicz, Patricia
7. Page, Edgar R.
8. Peterson, John
9. Quinn, Timothy
10. Tobia, Robert
11. Van Buskirk, Bruce
12. Xifaras, Michael

December 11, 2014

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For the Court's convenience, I also enclose a self-address UPS envelope for return of the signed subpoenas.

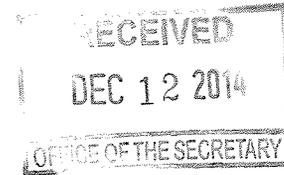
Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alexander Janghorbani', written over the text 'Respectfully submitted,'.

Alexander Janghorbani
Senior Trial Counsel

Enclosures

cc: Richard D. Marshall, Esq., Respondent's counsel
Robert Iseman, Esq., Respondent's counsel
Brent J. Fields, Secretary



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Joseph Arena
c/o Richard D. Marshall, Esq.
Ropes & Gray LLP
1211 Avenue of the Americas
New York, New York 10036

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Sean Burke
c/o Donald A. Corbett, Esq.
Lowenstein Sandler LLP
1251 Avenue of the Americas
New York, New York 10020

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Jeremy Cook



You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Robert Jackson



You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Heather Madigan
[REDACTED]
[REDACTED]

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In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM
UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Patricia Milkiewicz
[REDACTED]

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Edgar R. Page
c/o Richard D. Marshall, Esq.
Ropes & Gray LLP
1211 Avenue of the Americas
New York, New York 10036

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

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Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: John Peterson
c/o Linda Riefberg, Esq.



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In testimony whereof, the undersigned, an officer designated by the Securities and Exchange Commission, has hereunto set his hand at Washington, D.C. this ___ day of _____, 201__.

Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM
UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Timothy Quinn
c/o Linda Riefberg, Esq.

[REDACTED]
[REDACTED]
[REDACTED]

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

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Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Robert Tobia
c/o Thomas R. Fallati, Esq.
Tabner, Ryan and Keniry, LLP
18 Corporate Woods Boulevard, Ste. 8
Albany, New York 12211

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

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Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Bruce Van Buskirk
c/o Robert Y. Lewis, Esq.
Freeman Lewis LLP
228 E. 45th Street
New York, New York 10017

You are hereby required to appear before the Honorable Jason S. Patil, Administrative Law Judge of the Securities and Exchange Commission, at Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on the 2nd day of February, 2015, at 9:30 a.m., to provide testimony in the *Matter of Edgar R. Page, et al.*, AP File No. 3-16037, a public administrative and cease-and-desist proceeding instituted pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

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Honorable Jason S. Patil
Administrative Law Judge



SUBPOENA AD TESTIFICANDUM

UNITED STATES OF AMERICA
Securities and Exchange Commission

To: Michael Xifaras
[REDACTED]

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Administrative Law Judge